

INSD Pro Se Civil Generic Complaint (unrelated to imprisonment) 4/19 (Adapted from AO Pro Se 1 (Rev. 12/16) Complaint for a Civil Case)

FILED

## UNITED STATES DISTRICT COURT

MAR - 2 2020

for the

US DISTRICT COURT  
NEW ALBANY DIVISION

Southern District of Indiana

EIDDEMADE LLC.

4 : 20 -CV- 052 TWP -DML

Eddie M. Green Jr. (owner)

Case No.

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint.  
If the names of all the plaintiffs cannot fit in the space above,  
please write "see attached" in the space and attach an additional  
page with the full list of names.)

Jury Trial: (check one) ☐ Yes ☐ No

-v-

(owner) FOR CHAIN VOLT INC  
AKA VAURUGAN/CHAIN VOLT INC

Defendant(s)

(Write the full name of each defendant who is being sued. If the  
names of all the defendants cannot fit in the space above, please  
write "see attached" in the space and attach an additional page  
with the full list of names.)

## COMPLAINT FOR A CIVIL CASE

## NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

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**I. The Parties to This Complaint**

**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Eddie M. Green Jr.  
 Street Address 1415 East 8th Street  
 City and County Jeffersonville Ind. Clark  
 State and Zip Code Indiana 47130  
 Telephone Number 812 557-6428  
 E-mail Address SmartSafetyTechnology@gmail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

**Defendant No. 1**

Name ARA YAVRUYAN  
 Job or Title (*if known*) owner of Chain Vault Inc  
 Street Address 321 N. PASS Ave. Suite 222  
 City and County Burbank, Los Angeles  
 State and Zip Code California 91505  
 Telephone Number (858) 230-8257  
 E-mail Address (*if known*) Support@intelicone.com

**Defendant No. 2**

Name \_\_\_\_\_  
 Job or Title (*if known*) \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 City and County \_\_\_\_\_  
 State and Zip Code \_\_\_\_\_  
 Telephone Number \_\_\_\_\_  
 E-mail Address (*if known*) \_\_\_\_\_

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Defendant No. 3

Name \_\_\_\_\_

Job or Title (if known) \_\_\_\_\_

Street Address \_\_\_\_\_

City and County \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address (if known) \_\_\_\_\_

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

35 U.S. Code § 271. Infringement of Patent

### B. If the Basis for Jurisdiction Is Diversity of Citizenship

#### 1. The Plaintiff(s)

##### a. If the plaintiff is an individual:

The plaintiff, (name) \_\_\_\_\_, is a citizen of  
the State of (name) \_\_\_\_\_, OR is a citizen of  
(foreign nation) \_\_\_\_\_.

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- b. If the plaintiff is a corporation:

The plaintiff, (name) \_\_\_\_\_, in incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

- a. If the defendant is an individual:

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_, OR is a citizen of (foreign nation) \_\_\_\_\_.

- b. If the defendant is a corporation:

The defendant, (name) ARA YARRUYAN, in incorporated under the laws of the State of (name) CALIFORNIA, and has its principal place of business in the State of (name) CALIFORNIA.

Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

min. 2.8 million

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### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

CHAIN VOLT INC. owner ARA VAVRUYAN HAS  
INFRINGED ON THE PATENT THAT WAS ISSUED TO  
ME, PATENT NUMBER 9,940,796 I WAS NOTIFIED  
ON 2/28/2020 BY A FRAUD.

### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

My business start-up has been stopped and my product  
name is damaged because of CHAIN VOLT INC. and  
ARA VAVRUYAN actions.

### V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

#### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

3/2/2020

Signature of Plaintiff

Printed Name of Plaintiff

  
Eddie M. Green Jr.

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**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney \_\_\_\_\_

Printed Name of Attorney \_\_\_\_\_

Bar Number \_\_\_\_\_

Name of Law Firm \_\_\_\_\_

Street Address \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_